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9 *Renee Jenkins*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12
13 RENEE JENKINS, an Individual,
14 Plaintiff,

15 v.

16 PRIME WASHINGTON, LLC, d/b/a
17 CORNERSTONE CROSSINGS
18 APARTMENTS, a Delaware limited
liability company; PRIME
19 ADMINISTRATION, LLC, d/b/a PRIME
GROUP, a Delaware limited liability
20 company; PAULETTA DEARINGER, an
individual; ROE PROPERTY
21 MANAGEMENT COMPANY; ROE
22 PROPERTY MANAGER; DOES I-X; and
23 ROE BUSINESS ENTITIES XI-XX,
inclusive,

24 Defendants.

CASE NO.: 2:20-CV-00653-JCM-DJA

**STIPULATION AND
ORDER FOR EXTENSION OF
TIME TO FILE A REPLY IN
SUPPORT OF PLAINTIFF RENEE
JENKINS'S MOTION TO REMAND**

(First Request)

25 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff RENEE
26 JENKINS, through her counsel of record, Dennis M. Prince, Kevin T. Strong, and Angela
27 M. Lee of PRINCE LAW GROUP, and Defendants PRIME WASHINGTON, LLC, d/b/a
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1 CORNERSTONE CROSSINGS APARTMENTS, PRIME ADMINISTRATION, LLC,
 2 d/b/a PRIME GROUP, and PAULETTA DEARINGER, by and through their counsel of
 3 record, Rachel J. Holzer and Thomas McGrath of TYSON & MENDES LLP, that the
 4 deadline for Plaintiff to file her Reply in Support of Plaintiff Renee Jenkins's Motion to
 5 Remand (ECF No. 23) shall be extended by seven (7) days, from May 29, 2020 to June
 6 5, 2020. Plaintiff's Motion to Remand was filed on May 7, 2020. Th
 7 stipulation for extension of time to file Plaintiff's Reply in Support of Plaintiff Renee
 8 Jenkins's Motion to Remand. This Stipulation and [Proposed Order] is submitted in
 9 accordance with LR IA 6-1.

10 Good cause exists to grant the parties' stipulation. There are complex procedural
 11 matters that require additional time to appropriately reply to Defendant's Opposition.
 12 This additional time will provide the Plaintiff more time to fully and properly apprise
 13 the Court of the legal issues in this matter. There are currently no scheduled hearings
 14 in this case. A short extension to file an opposition will not unduly delay the
 15 proceedings, nor adversely affect or prejudice the parties. This request is not being
 16 made in bad faith, but to allow Plaintiff's counsel time to properly respond to

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Defendants' Opposition. Therefore, the parties respectfully request this Court to approve the foregoing stipulation.

DATED this 29th day of May, 2020.

DATED this 29th day of May, 2020

PRINCE LAW GROUP

TYSON & MENDES, LLP

/s/ Dennis M. Prince

/s/ Thomas McGrath

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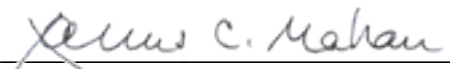
Las Vegas, Nevada 89135

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED May 29, 2020.


UNITED STATES DISTRICT JUDGE

